

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NATIONAL PRODUCTS, INC.,

Plaintiff,

v.

LIFEDGE LTD., SCANSTRUT LTD.,

Defendants.

Case No. 2:12-cv-1865

**COMPLAINT**

**JURY TRIAL DEMANDED**

For its Complaint, Plaintiff National Products, Inc. (“NPI”) states and alleges as follows:

**The Parties**

1. NPI is a corporation organized and existing under the laws of the State of Washington, having its principal place of business at 8410 Dallas Ave S., Seattle, Washington 98108.

2. NPI is a market leader in the design, manufacture, and sale of innovative protective cases and vehicle mounting systems for electronic devices.

3. Upon information and belief, Defendant Lifedge Limited (“Lifedge”) is a private limited company organized and existing under the laws of the United Kingdom, having its principal place of business at 1 Malt Mill, Malt Mill Lane, Totnes, Devon, United Kingdom TQ9 5NH.

1           4.       Upon information and belief, Defendant Scanstrut Limited (“Scanstrut”) is a  
2 private limited company organized and existing under the laws of the United Kingdom,  
3 having its principal place of business at 1 Malt Mill, Malt Mill Lane, Totnes, Devon, United  
4 Kingdom TQ9 5NH.

5           5.       Upon information and belief, Lifedge and Scanstrut (collectively  
6 “Defendants”) are manufacturers and distributors of waterproof and water-resistant iPad  
7 cases. Lifedge advertises, markets, and sells its products to the public throughout the United  
8 States, including within this judicial district, through a website operated by Scanstrut. Upon  
9 information and belief, Lifedge and Scanstrut have advertised and sold the products which are  
10 the subject of the patent infringement alleged in this lawsuit in this district.

11                               **Jurisdiction and Venue**

12           6.       This is an action for patent infringement arising under the Acts of Congress  
13 relating to patents, 35 U.S.C. §§ 271, 281–285.

14           7.       This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and  
15 1338(a).

16           8.       Venue is proper in this judicial district under 28 U.S.C. §§ 1391 and 1400(b).

17                               **The ’895 Patent**

18           9.       On February 24, 2009, U.S. Patent No. 7,495,895 (“the ’895 patent”), entitled  
19 “Protective Cover for Device Having Touch Screen,” was duly and legally issued to Jeffrey  
20 D. Carnevali. The ’895 patent was assigned to NPI on August 24, 2009. A copy of the ’895  
21 patent is attached as **Exhibit A**. The ’895 patent is generally directed to a protective cover for  
22 a touch-sensitive electronic device, such as an iPad.

23                               **Count I — Patent Infringement**

24           10.      NPI realleges and reincorporates the allegations in paragraphs 1–9 above.

25           11.      Defendants have been, are currently, and will continue to infringe one or more  
26 claims of the ’895 patent, directly, contributorily, and/or by inducement, by making, using,

1 offering to sell, and selling within the United States and/or importing into the United States  
2 products that infringe the '895 patent, including without limitation all waterproof iPad cases  
3 advertised and sold under the name Lifedge on the website: <http://www.lifedge.co.uk/product>,  
4 including in this judicial district.

5 12. As a direct and proximate consequence of Defendants' infringement of the  
6 '895 patent, NPI has suffered irreparable harm, and NPI will continue to suffer irreparable  
7 harm in the future unless Defendants are enjoined from infringing the '895 patent.

8 13. Upon information and belief, the continued infringement by Defendants of the  
9 '895 patent is willful.

10 **Prayer for Relief**

11 WHEREFORE, NPI prays for the following relief:

- 12 a. A judgment that Defendants have infringed the '895 patent;
- 13 b. An order preliminarily and permanently enjoining and restraining Defendants,  
14 their officers, directors, agents, servants, employees, licensees, attorneys, and all other  
15 persons acting under or through Defendants, directly or indirectly, from infringing the '895  
16 patent;
- 17 c. A judgment and order requiring that Defendants pay damages under 35 U.S.C.  
18 § 284, including treble damages as provided by 35 U.S.C. § 284, with prejudgment interest;
- 19 d. A judgment and order directing Defendants to pay the costs of this action  
20 (including all disbursements) and attorney fees as provided by 35 U.S.C. § 285, with  
21 prejudgment interest;
- 22 e. Such other and further relief as the Court may deem just and equitable.
- 23  
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26

**Demand for Jury Trial**

NPI hereby demands a trial by jury of all issues so triable.

NATIONAL PRODUCTS, INC.

By its attorneys,

Dated: October 22, 2012

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